

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE REALTY MANAGEMENT, INC.,) Docket No. 04-333 ERIE
vs.) (Judge Sean J. McLaughlin)
JOHN ALLIN d/b/a ALLIN COMPANIES and SNOW MANAGEMENT GROUP,)
Plaintiff) ELECTRONICALLY FILED PLEADING
vs.)
vs.) PLAINTIFF'S MOTION FOR SUMMARY
vs.) JUDGMENT
vs.)
vs.) Filed on behalf of: Plaintiff, Heritage Realty
vs.) Management, Inc.
vs.)
Defendant) Counsel of record for this party:
vs.)
vs.) Richard A. Lanzillo, Esq.
vs.) Knox McLaughlin Gornall
vs.) & Sennett, P.C.
vs.) 120 West 10th Street
vs.) Erie, PA 16501
vs.) Telephone (814) 459-2800
vs.) Facsimile (814) 453-4530
vs.) Email rlanzillo@kmgslaw.com
vs.) PA53811

**PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

Pursuant to F.R.C.P. 56 and L.R. 56.1, plaintiff, Heritage Realty Management, Inc., hereby moves for summary judgment against defendant, John Allin, and respectfully requests the entry of judgment in the amount of \$340,482.90, plus interest from October 13, 2004, and costs of suit. No genuine issue of material fact remains for trial and plaintiff is entitled to judgment as a matter of law.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo, Esq.

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